

## REMARKS

The Office Action of April 11, 2007 has been received and carefully reviewed. It is submitted that, by this Response, all bases of rejection are traversed and overcome. Upon entry of this Response, claims 1-23 remain in the application. Reconsideration of the claims is respectfully requested.

The indication that claims 3, 4, 6, 11, 12, 14, 19 and 21 contain allowable subject matter is noted and appreciated.

Claims 1, 2, 5, 7-10, 13, 15-18 and 20-22 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Ikeda (U.S. Publication No. 2002/0174360). Since claim 21 is listed as containing allowable subject matter, Applicants assume that claim 21 was inadvertently listed in this rejection, and that claims 20 and 22 (not claims 20 through 22) stand rejected under 35 U.S.C. § 102(b). The Examiner states that Ikeda teaches a method and system for automated enrollment and activation of a telematics unit. The Examiner specifically references paragraphs [0281] – [0286], [0289], [0294], [0297], and [0298] of Ikeda.

In response thereto, Applicants respectfully disagree with the Examiner. Independent claims 1, 9 and 17 are directed to a method for automated unit service requests from a telematics unit, a computer usable medium including a computer program for automated service requests from a telematics unit, and a system for automated unit service requests from a telematics unit, respectively. Claims 1, 9 and 17 recite “setting a unit request **call trigger** at the telematics unit from a call center” and “configuring the telematics in response to the received unit request call.”

As clearly set forth in Applicants’ specification as filed at page 8, lines 2-5, a call trigger is:

[A] condition detected **to activate** a function based on a **logical, physical or temporal event**. Examples of possible trigger conditions include an accumulated count of ignition cycles or a predetermined time and date.” (Emphasis added).

Ikeda, on the other hand, discloses a service providing system which offers after-sales services for a product purchased by a user. The system includes a service server that actively accesses a specific navigation system (i.e., the product) (which is one of several navigation systems on a communication network) and provides service information to that particular navigation system. (See Abstract of Ikeda). For example, the service server may search a user database to find users having a particular navigation system, and then transmit navigation system IDs and data to an application server, which then transmits the data to the navigation system(s) corresponding to one of the IDs. (See paragraphs [0156] - [0157] of Ikeda). In another example, the navigation system may transmit ID data to the service server telling the service server that the navigation system is in operation, and the service server may transmit data back to the navigation system. (Paragraph [0160] of Ikeda). In yet another example, the navigation system may receive a software update from the manufacturer of the navigation system. (Paragraph [0162]).

However, Ikeda does **NOT** disclose or even suggest setting a unit request **call trigger** at the navigation system from the service server, where the call trigger is a condition detected to activate a function based on a **logical, physical or temporal event**. At most, Ikeda teaches that services may be transmitted to the navigation system of a user as *the services become available* (such as, for example, a notice to purchase a currently available updated version of software). (See, e.g., paragraph [0156]). The *sudden* availability of an updated medium may generally be described as an undeterminable occurrence, which is **not** the same as setting a unit request **call trigger** that activates a function based on a **logical, physical, or temporal event**.

Furthermore, Applicants' invention as defined in claims 1, 9 and 17 includes an *unconfigured* or a *partially configured* telematics unit, which is configured in response to *receiving* a unit request call based on the call trigger. (See page 7, lines 19-23). The call trigger instructs the telematics unit to initiate a

unit request call at a predetermined future time, e.g., 10 minutes after a subscriber service call ends. (See Applicants' specification as filed at least at page 10, lines 13-15 and Fig. 2). Thus, the telematics unit is *waiting* for information to become available so that the telematics unit may be configured in response to the received unit request call.

In sharp contrast, and as provided above, Ikeda is directed to a service providing system offering after-sales services for a generally *complete* product (e.g., the navigation system), which was purchased by a user. Ikeda neither discloses nor even suggests that the navigation system is an *unconfigured* or a *partially configured* unit.

For all the reasons provided above, it is submitted that Applicants' invention as defined in claims 1, 9 and 17 is not anticipated, taught or rendered obvious by Ikeda, either alone or in combination, and patentably defines over the art of record. The remaining claims depend ultimately from one of claims 1, 9 or 17. It is submitted that, through this dependency, Applicants' invention as defined in these claims also is not anticipated, taught or rendered obvious by Ikeda, either alone or in combination, and patentably defines over the art of record.

Applicants respectfully point out that claim 23 is neither included in the allowed claims nor in the rejected claims. Claim 23 depends from claim 1. For all the reasons provided hereinabove regarding the patentability of claim 1, Applicants respectfully submit that claim 23 is also allowable.

In summary, claims 1-23 remain in the application. It is submitted that, through this Response, Applicants' invention as set forth in these claims is now in a condition suitable for allowance.

Appln. S.N. 10/797,733  
Amdt. dated July 11, 2007  
Reply to Office Action of April 11, 2007  
Docket No. GP-304358-OST-ALS  
Page 10 of 10

Further and favorable consideration is requested. If the Examiner believes it would expedite prosecution of the above-identified application, the Examiner is cordially invited to contact Applicants' Attorney at the below-listed telephone number.

Respectfully submitted,

DIERKER & ASSOCIATES, P.C.

/Julia Church Dierker/

Julia Church Dierker  
Attorney for Applicants  
Registration No. 33368  
(248) 649-9900, ext. 25  
juliad@troypatent.com

3331 West Big Beaver Rd., Suite 109  
Troy, Michigan 48084-2813

Dated: July 11, 2007  
JCD/AMS/JRK